

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHELLE CHRISTIAN)	
)	CIVIL ACTION
Plaintiff,)	
)	CASE NO.: 24-1319
v.)	
)	
OMNIS GLOBAL TECHNOLOGIES, LLC)	
and)	
OMNIS BUILDING TECHNOLOGIES, LLC)	
and)	
OBT BLUEFIELD, LLC)	
and)	
OMNIS FUEL TECHNOLOGIES LLC)	
d/b/a OMNIGEN)	
and)	
OMNIS SUBLIMATION RECOVERY)	
TECHNOLOGIES, LLC)	
)	
Defendants.)	

DECLARATION OF MICHELLE CHRISTIAN

I Michelle Christian, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following facts are true and correct and based on personal knowledge:

1. I am a resident of the Commonwealth of Pennsylvania and currently reside at 109 Signal Hill Road, Holland, PA 18966.
2. I have lived in Bucks County, Pennsylvania since 2003.
3. I met Omnis' owner Simon Hodson through a mutual colleague prior to my employment.
4. Simon Hodson and I met in person, in Western Pennsylvania at the CONSOL Bailey Prep Plant (located in West Finley, PA), to discuss the terms of my proposed employment. Omnis Global Technologies, LLC had formed a joint venture with

CONSOL Coal Resources LP (often referred to as “CONSOL Energy”) called Omnis Bailey, LLC (now d/b/a Omnis Regenerative Energy); through this joint venture, Omnis was renting space at the Pennsylvania Mining Complex (specifically the Bailey Coal Mine), where it was processing waste coal to convert it into useable clean carbon fuel pellets.

5. “Omnis Global Technologies, LLC” hired me as a Vice President of Governmental Relations on November 16, 2020.
6. I was employed as a remote employee to work from my home office in Bucks County Pennsylvania; I was never provided a work issued computer, printer or office supplies (I provided all of these things on my own).
7. I was never provided a work issued cell phone, and only utilized my personal telephone number for business reasons, utilizing a 215-area code.
8. My employment required some travel in state and outside the state of Pennsylvania.
9. To the best of my recollection, a timeline of my work locations are as follows:

During 2023, I worked in Pennsylvania for 185 days, in Washington, D.C. for 24 days, in West Virginia for 10 days, and Kentucky for 1 day;

During 2022, I worked in Pennsylvania for 316 days, in Washington D.C. for 28 days, in West Virginia for 17 days, and Kentucky for 4 days;

During 2021, I worked in Pennsylvania for 347 days (as there was a furlough and travel was restricted); and

During 2020, I began work in November that year, and worked for 42 days in Pennsylvania, and in Washington D.C. for 5 days.
10. I was expected to, and did, use my governmental and non-governmental contacts to help expand all Omnis’ companies and to garner governmental and non-governmental

funding and support for new and existing Omnis ventures, including obtaining new investors.

11. Throughout my employment, I provided support to the Omnis' Bailey facility in Pennsylvania, participating in their weekly staffing calls, and this PA facility remained part of my normal workload/responsibilities. This facility was primarily operated by Keith Thompson (residing out of Pennsylvania and Utah), and Charles Gassenheimer (residing out of New York).
12. In terms of business operations in West Virginia – Defendants did not start operating in the Morgantown, WV facility until in or about 2022, and they only have about 8-10 employees working out of this facility. Defendants also operate a power plant for “Omnis Fuel Technologies,” which is located in Pleasants County, West Virginia (there are 100s of employees at this site, but I do not know if they are “Omnis” employees on their payroll or contract employees through a different named employer/entity). OBT Bluefield purportedly maintains a presence in West Virginia, but the building for this entity is vacant and houses no employees nor equipment. Finally, though “located” in West Virginia, Omnis Sublimation Recovery has no physical building or warehouse facility at all.
13. Though Defendants may have physical operations at sites in West Virginia, I did not interact with any of those hourly workers at those sites, and almost exclusively dealt with executive levels of management who were not situated in West Virginia (with the exception of Jonathan Hodson and Mathew Hart).

14. Simon Hodson regularly came to Pennsylvania during my employment, accompanied by other Omnis employees to visit the PA Omnis' Bailey facility, and stayed and conducted meetings at the Courtyard Marriott in Washington, PA.

15. All my medical doctors and my therapists who may be called to provide records or as witnesses in this matter are located in Bucks County Pennsylvania.

16. The following people will likely be called as witnesses to testify in this matter:

- Owner of all Omnis' entities, Simon Hodson, whose primary business "Hodson Investments LLC," is registered and Simon Hodson resides in Santa Barbara, California;
- Omnis' CFO, Randall Smith, who resides in California;
- Omnis' Administrative Assistant, Michele Kosinski, who resides in California;
- Omnis' In-House Counsel, Blake Stephens, who resides outside of Pittsburgh, Pennsylvania and utilizes a personal phone number with an area code from Pittsburgh (724-914-0973);
- Omnis' Business Partner, Charles Gassenheimer, who resides in New York;
- Lobbyist: Randa Fahmy, who resides in New Jersey;
- Omnis' Business Development Director, Richard Kingan, who resides in Georgia;
- Omnis' Global Government Relations Director (and son-in-law), Doug Quezada, who resides in Utah;
- President of Omnis' "Pleasants Power Station" d/b/a Omnigen, Richard Hulme, who resides in California;
- Omnis' Engineer, Doug Grunder, who resides in Idaho;
- Omnis' Attorney, Alex Simpson, who resides in New Jersey;

- Peggy Hodson, part Owner of Hodson Investments, LLC, who resides in Santa Barbara, California with her husband: Simon Hodson;
- Omnis' VP of Human Resources, Mathew Hart, who purportedly resides in West Virginia (but utilizes a Utah telephone number); and
- Part owner of Omnis' Fuel Technologies, LLC d/b/a Omnigen, Tony Robbins, who resides in Florida.

17. Blake Stephens is the Omnis Employee who conveyed my termination via email on September 9, 2024; as stated, he resides in Pennsylvania.

18. I can't say with certainty where Simon Hodson may have been physically located on the date I was terminated, as he often traveled during my period of employment, both nationally and internationally (to places such as China, Saudi Arabia, and the Philippines). When he was actually in the United States, he stayed at his families' homes in Santa Barbara, CA, West Virginia, Ohio or Utah (and if in Virginia, it was in Charlottesville, VA where his daughter Savannah Turk and son-in-law Matt Turk reside). Simon Hodson would often stay with his daughter in Charlottesville, VA before and after he attended meetings local to Washington, D.C.

19. To my knowledge, the only witness with whom I had any relevant communication with who are located in West Virginia was Simon Hodon's son: Jonathan Hodson, and Mathew Hart: VP of Human Resources.

20. I am actively attempting to mitigate my losses following my termination from Defendants, and am seeking employment local to the Philadelphia area.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 6/11/2024



Michelle Christian